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10 Attorneys for Defendant
11 CHICAGO TITLE INSURANCE COMPANY

12 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
13 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

14 Gary L. Compton, State Bar No. 1652
2950 E. Flamingo Road, Suite L
15 Las Vegas, Nevada 89121

16 **UNITED STATES DISTRICT COURT**
17
DISTRICT OF NEVADA

18
19 U.S. BANK, N.A., AS TRUSTEE,
20 SUCCESSOR IN INTEREST TO
WACHOVIA BANK NATIONAL
21 ASSOCIATION, AS TRUSTEE FOR GSAA
HOME EQUITY TRUST 2005-11, ASSET-
BACKED CERTIFICATES, SERIES 2005-
11,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

25 Defendants.
26

27 Case No.: 2:21-cv-00339-GMN-VCF

28 **STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 7] AND MOTION FOR FEES AND
COSTS [ECF No. 8]**

(Second Request)

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank
2 N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby
3 stipulate and agree as follows:

- 4 1. On February 26, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-21-830198-C [ECF No. 1-1];
- 6 2. On February 26, 2021, Chicago Title filed a Petition for Removal to this Court [ECF
7 No. 1];
- 8 3. On March 30, 2021, U.S. Bank filed a Motion for Remand [ECF No. 7] and Motion
9 for Costs and Fees [ECF No. 8];
- 10 4. On April 9, 2021, Chicago Title filed a Stipulation and Proposed Order extending
11 Chicago Title’s time to respond to the Motion for Remand and Motion for Fees and
12 Costs to May 5, 2021;
- 13 5. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion
14 for Costs and Fees is currently May 5, 2021;
- 15 6. Chicago Title’s counsel is requesting an extension until June 2, 2021, to file its
16 response to the pending Motion for Remand and Motion for Costs and Fees;
- 17 7. Chicago Title requests an extension of time to respond to the Motion for Remand and
18 Motion for Costs and Fees to afford Chicago Title additional time to respond to the
19 legal arguments set forth in U.S. Bank’s motions;
- 20 8. U.S. Bank does not oppose the requested extension;
- 21 9. This is the second request for an extension which is made in good faith and not for
22 purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8] is hereby extended through
3 and including June 2, 2021.

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5 Dated: May 3, 2021

6

7 EARLY SULLIVAN WRIGHT
8 GIZER & MCRAE LLP

9

10 By: /s/-- Sophia S. Lau
11 SCOTT E. GIZER
12 SOPHIA S. LAU
13 Attorneys for Defendant CHICAGO TITLE
14 INSURANCE COMPANY

15

16 Dated: May 3, 2021

17

18 SINCLAIR BRAUN LLP

19

20 By: /s/-Kevin S. Sinclair
21 KEVIN S. SINCLAIR
22 Attorneys for Defendant CHICAGO TITLE
23 INSURANCE COMPANY

24

25 Dated: May 3, 2021

26

27 WRIGHT FINLAY & ZAK, LLP

28

29 By: /s/-Lindsay D. Robbins
30 LINDSAY D. ROBBINS
31 Attorneys for Plaintiff U.S. BANK
32 NATIONAL ASSOCIATION

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34 **IT IS SO ORDERED.**

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36 Dated this 3 day of May, 2021

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CERTIFICATE OF SERVICE
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5

I hereby certify that on May 3, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

10 */s/ D'Metria Bolden* _____
11 D'METRIA BOLDEN
12 An Employee of EARLY SULLIVAN
13 WRIGHT GIZER & McRAE LLP
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